Robert Scott
Product Specialties, Inc.
2073 McDonald Avenue,
New Albany, IN 47150

Re: 043-10564
First Significant Revision to
FESOP 043-6294-00039

Dear Robert Scott:

Product Specialities, Inc. was issued a permit on August 12, 1997 for plastic film manufacturing plant. A letter requesting changes to this permit was received on January 21,1999. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

Several changes were made to Sections A and D related to extruders 1 and 2. A combined limit on production was added. Two insignificant activities were added to the permit. Additional language changes were made.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Gurinder Saini or extension (3-0203), or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
GS
cc: File - Floyd County
U.S. EPA, Region V
Floyd County Health Department
Air Compliance Section Inspector - Joe Foyst
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 1-800-451-6027

Product Specialties, Inc.
2073 McDonald Avenue
New Albany, Indiana 47150

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

<table>
<tr><td colspan="2">Operation Permit No.: F043-6294-00039</td></tr>
<tr><td>Issued by:
Paul Dubenetzky, Branch Chief
Office of Air Management</td><td>Issuance Date: August 12, 1997</td></tr>
<tr><td colspan="2">First Significant FESOP Modification: 043-10076 issued on November 16,1998

First Significant Permit Revision: 043-10564 Pages Affected: 4, 4a, 5, 19, 21, 23, 26b</td></tr>
<tr><td>Issued by:

Paul Dubenetzky, Branch Chief
Office of Air Management</td><td>Issuance Date:</td></tr>
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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information

The Permittee owns and operates a plastic film manufacturing plant.

Responsible Official:	Edward M. Ernst
Source Address:	2073 McDonald Avenue, New Albany, Indiana 47150
Mailing Address:	2073 McDonald Avenue, New Albany, Indiana 47150
SIC Code:	3081
County Location:	Floyd County
County Status:	Nonattainment for VOCs and NOx
Source Status:	Synthetic Minor Source, FESOP Program

A.2 Emission Units and Pollution Control Summary

The stationary source consists of the following emission units and pollution control devices:

(a) One (1) PVC resin powder storage silo, EU-01, with a maximum storage capacity of 78.8 tons. This silo is equipped with a baghouse for particulate matter control and exhausts to stack vent V1. The material is conveyed via one (1) PVC resin powder transfer system, EU-03, at a maximum throughput capacity of 3,883 tons per year. This system exhausts to stack vent V3;

(b) One (1) calcium carbonate (CaCO3) storage silo, EU-02, with a maximum storage capacity of 61 tons. This silo is equipped with a baghouse for particulate matter control and exhausts to stack vent V2. The material is conveyed via one (1) CaCO3 transfer system, EU-04, with a maximum throughput capacity of 2,590 tons per year. This system exhausts to stack vent V3;

(c) Two (2) plastic film mixing lines, identified as EU-05, and EU-10. Each line consists of a dry scale, scale transfer, mixer transfer, mixer, cool blend transfer, tote transfer, ribbon blender, and ribbon blend transfer. The dry scales shall be equipped with dedicated filter socks that exhaust to the interior of the plant. The mixer and mixer transfer operations shall be equipped with a baghouse which exhausts to the interior of the plant. These lines also consists of a liquid scale with a maximum throughput of 4,800 pounds per hour and a liquid mixer with a maximum throughput of 720 pounds per hour;

(d) Two (2) extrusion units, identified as EU-06 and EU-07 that exhaust to stacks S4 and S5, respectively. Each extrusion unit is limited to 521 pounds of compound per hour;

(e) One (1) rotogravure press, identified as EU-09, with a maximum coverage of 15 pounds of ink per million square inches (lb/MM in^2) of PVC sheet;

(f) One (1) rotogravure press with four (4) color printing heads, identified as EU-11, with a maximum coverage of 14.4 lb/MM in^2 of PVC sheet;

(g) One (1) Wash Coater #2, with a line speed of 150 feet per minute (ft/min), and a coating width of 57 inches; and

(h) Two (2) laminators, identified as EU-08, and EU-12. Each laminator has a limited production rate of 7,384,680 yds laminated film/year.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]
This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

(a) one (1) natural gas-fired boiler rated at 2.7 mmBtu per hour;
(b) one (1) natural gas-fired boiler rated at 2.0 mmBtu/hr,
(c) two (2) natural gas-fired indirect heaters rated at 0.75 mmBtu/hr each,
(d) one (1) cold cleaner degreasing operation with a capacity of 20 gallons to clean small parts;

(e) three (3) granulators that chop waste film and recirculate to the mixing line;

(f) one (1) plastisol mixing line with emissions exhausting to the interior of the plant;
(g) VOC/HAP storage containers for lubricating oils, hydraulic oils, machining oils, and machining fluids;
(h) equipment relating to manufacturing activities that does not result in HAP emissions including brazing equipment, cutting torches, soldering equipment, and welding equipment;
(i) closed loop heating and cooling systems;
(j) natural draft cooling towers not regulated under a NESHAP;
(k) replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
(l) paved and unpaved roads and parking lots with public access; and
(m) blowdown for sight glass, boiler, compressors, pumps, and cooling towers.
(n) Two natural gas fired dryers rated at 304,000 BTU/hr each,
(o) One natural gas fired space heater rated at 580,000 BTU/hr.

A.4 FESOP Applicability [326 IAC 2-8-2]
This stationary source, required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

SECTION D.1 FACILITY OPERATION CONDITIONS

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

A plastic film manufacturing line consisting of:

(a) One (1) PVC resin powder storage silo, EU-01, with a maximum storage capacity of 78.8 tons. This silo is equipped with a baghouse for particulate matter control and exhausts to stack vent V1. The material is conveyed via one (1) PVC resin powder transfer system, EU-03, at a maximum throughput capacity of 3,883 tons per year. This system exhausts to stack vent V3;

(b) One (1) calcium carbonate (CaCO3) storage silo, EU-02, with a maximum storage capacity of 61 tons. This silo is equipped with a baghouse for particulate matter control and exhausts to stack vent V2. The material is conveyed via one (1) CaCO3 transfer system, EU-04, with a maximum throughput capacity of 2,590 tons per year. This system exhausts to stack vent V3;

(c) Two (2) plastic film mixing lines, identified as EU-05, and EU-10. Each line consists of a dry scale, scale transfer, mixer transfer, mixer, cool blend transfer, tote transfer, ribbon blender, and ribbon blend transfer. The dry scales shall be equipped with dedicated filter socks that exhaust to the interior of the plant. The mixer and mixer transfer operations shall be equipped with a baghouse which exhausts to the interior of the plant. These lines also consists of a liquid scale with a maximum throughput of 4,800 pounds per hour and a liquid mixer with a maximum throughput of 720 pounds per hour;

(d) Two (2) extrusion units, identified as EU-06 and EU-07 that exhaust to stacks S4 and S5, respectively. Each extrusion unit is limited to 521 pounds of compound per hour;

(e) One (1) rotogravure press, identified as EU-09, with a maximum coverage of 15 pounds of ink per million square inches (lb/MM in2) of PVC sheet;

(f) One (1) rotogravure press with four (4) color printing heads, identified as EU-11, with a maximum coverage of 14.4 lb/MM in2 of PVC sheet;

(g) One (1) Wash Coater #2, with a line speed of 150 feet per minute (ft/min), and a coating width of 57 inches; and

(h) Two (2) laminators, identified as EU-08, and EU-12. Each laminator has a limited production rate of 7,384,680 yds laminated film/year.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter

Pursuant to 326 IAC 6-3 (Process Operations), the following facilities of the plastic film manufacturing plant shall not exceed the following associated particulate matter emissions:

Process Facility	Stack ID	Allowable PM Emission (lbs/hr)
Resin Powder Storage Silo/Transfer System	V1	2.37
CaCO3 Storage Silo/Transfer System	V2	1.79
Plastic Film Mixing Line/Granulators, EU-05	V3	3.52

Extrusion Unit, EU-06	S4	1.66
Extrusion Unit, EU-07	S5	1.66
Laminator, EU-08	S6	0.90
Plastic Film Mixing Line, EU-10	V3	3.52
Laminator, EU-12	S8	0.90
TOTAL		16.36

D.1.2 Particulate Matter < 10 microns (PM-10)

Pursuant to 326 IAC 2-8 (FESOP Program), the following facilities of the plastic film manufacturing plant shall not exceed the following associated material throughput rates and PM-10 emissions:

Process Facility	Stack ID	Throughput Limits (tons/hr)	Emission Factors	PM-10 Emission Limits (lbs/hr)
Resin Powder Storage Silo/Transfer System	V1	0.44	13 lb/ton	2.37
CaCO3 Storage Silo/Transfer System	V2	0.29	13 lb/ton	1.79
Plastic Film Mixing Line/Granulators, EU-05	V3	0.794	0.6 lb/ton	3.52
Extrusion Unit, EU-06	S4	0.51	0.00232 lb/lb	1.66
Extrusion Unit, EU-07	S5	0.51	0.00232 lb/lb	1.66
Laminator, EU-08	S6	1800*	0.0005 lb/yd	0.90
Plastic Film Mixing Line, EU-10	V3	0.794	0.6 lb/ton	3.52
Laminator, EU-12	S8	1800*	0.0005 lb/yd	0.90

* this throughput limit is measured as yards of PVC sheet/hr
1 yard of PVC sheet = 15 ounces
1 ounce = 16 lb

The above PM emission limits shall be demonstrated using each corresponding Emission Factor to calculate the emissions. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 Visible Emissions

Pursuant to 326 IAC 5-1 (Visible Emissions Limitations), the visible emissions from the plastic film manufacturing plant shall not exceed an average of 40 percent opacity in 24 consecutive readings or 60 percent opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-11]

Pursuant to 326 IAC 8-2-11 (Fabric and Vinyl Coating VOC Limitations), the VOC content of the coatings used from the rotogravure presses EU-09, EU-11 and the wash coater #2 shall be limited to 4.8 pounds of VOC per gallon of coating less water delivered to the applicator.

D.1.5 Hazardous Air Pollutants

The hazardous air pollutant emissions shall be limited as follows:

(a) A single hazardous air pollutant (HAP) emissions shall not exceed 9 tons/12-month period rolled on a monthly basis.

(b) Any combination of HAPs emissions shall not exceed 24 tons/12-month period rolled on a monthly basis.

Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
Pursuant to 326 IAC 8-1-6, the two (2) Laminators shall be limited as follows:

(a) Laminator EU-08 shall be limited to a production rate of 7,358,400 yards of film per 12-month period rolled on a monthly basis. The limit on this laminator will restrict the VOC emissions to 24 tons per 12-month period rolled on a monthly basis. Compliance with this limit will make 326 IAC 8-1-6 (General Reduction) requirements not applicable in this case.

(b) The new Laminator, EU-12 shall be limited to a production rate of 7,358,400 yards of film per 12-month period rolled on a monthly basis. The limit on this laminator will restrict the VOC emissions to 24 tons per 12-month period rolled on a monthly basis. During its first twelve (12) months of operation, its production rate shall be limited such that the total production rate divided by the accumulated months of operation shall not exceed 613,200 yards per month.

Compliance with this limit will make 326 IAC 8-1-6 (General Reduction) requirements not applicable in this case.

D.1.7 Volatile Organic Compounds [326 IAC 2-8]
Pursuant to 326 IAC 2-8, the following facilities shall be limited as follows:

(a) The material compounded from Extruder Line 1 EU-06 and Extruder Line 2 EU-07 shall be limited to 9,127,920 pounds per 12 month period, rolled on a monthly basis.

(b) The VOC input usage from the new Rotogravure Press, shall be limited to 14.8 tons per 12-month period rolled on a monthly basis. During the first twelve (12) months of operation of this press, its input VOC usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 1.9 tons per month.

(c) The VOC input usage from the new Wash Coater #2, shall be limited to 8.1 tons per 12-month period rolled on a monthly basis. During the first twelve (12) months of operation of this coater, its input VOC usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 0.675 tons per month.

(d) The VOC input usage from the existing Rotogravure Press, EU-09 shall be limited to 5.6 tons per 12-month period rolled on a monthly basis.

Compliance with conditions D1.7(a) through (d) and D1.6 (a) and (b) shall make 326 IAC 2-7, Part 70 Permit Requirements not applicable.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.1.8 Visible Emissions Notations

(a) Visible emission notations of the plastic film mixing line stack exhaust shall be performed once per working shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) Visible emission notations from each storage silo baghouse stack exhaust shall be performed during loading operations. A trained employee shall record whether emissions are normal or abnormal.

(c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(f) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.1.9 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with condition B.13 of this permit is required for this facility.

D.1.10 Preventive Inspections

The following inspections shall be performed when the plastic film manufacturing line baghouse is operating in accordance with the Preventive Maintenance Plan prepared pursuant to condition B.13:

Weekly:
(a) Bag cleaning mechanisms;
(b) Condition of the ductwork; and
(c) Bag tension (shake or reverse-air units only).

Monthly:
(a) Internal inspection for air leaks;
(b) Bag condition; and
(c) Fan condition and operation.

Appropriate corrective actions shall be taken in accordance with condition C.9.

D.1.11 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse associated with the plastic film mixing line, at least once per working shift when its associated facility is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across each baghouse shall be maintained within the range of 2.0 and 8.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.12 Broken Bag or Failure Detection

That in the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the units have been replaced.

(b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

D.1.13 Particulate Matter
The particulate matter (PM) emissions shall be considered in compliance with 326 IAC 6-3 provided that:

(a) good housekeeping and equipment maintenance procedures are implemented;

(b) emissions are minimized in receiving, handling, and shipping operations by appropriate methods. These may include but need not be limited to, dust collection systems, windscreens, baffles, restricted hopper openings, enclosed transfer points, flexible drop spouts and/or sleeves;

(c) no visible accumulation of particulate matter beyond the plant property line;

(d) emissions do not violate 326 IAC 6-4 (Fugitive Dust Emissions); and

(e) visible emissions from the processes are operated under "normal" conditions in accordance with operation condition D.1.8.

D.1.14 Volatile Organic Compounds
The raw material limit in Condition D.1.6 and D.1.7 will result in an equivalent VOC emissions of 99 tons per 12 month. The emissions shall be calculated using the emission factor of 0.0043 lb of VOC/ lb compounded from the two extruders, EU-06 and EU-07, and emission factor 0.0065 lb VOC/yard of film from the two lamination lines, EU-8 and EU-12.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.15 Record Keeping Requirements

(a) To document compliance with Condition D.1.8, the Permittee shall maintain records of daily visible emission notations of each stack exhaust.

(b) To document compliance with Condition D.1.11, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all corrective actions implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(c) To document compliance with Condition D.1.6, and D.1.7 the Permittee shall maintain the daily film usages from Laminators EU-08 and Laminator EU-12; ink and solvent usages from Rotogravure Presses EU-09 and EU-11; material compounded from Extruders EU-06 and EU-07; solvent usages from Degreasing operations and other volatile organic material usages from the insignificant activities.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.6, and D.1.7 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Insignificant Activities:

(a) one (1) natural gas-fired boiler rated at 2.7 mmBtu per hour;
(b) one (1) natural gas-fired boiler rated at 2.0 mmBtu/hr,
(c) two (2) natural gas-fired indirect heaters rated at 0.75 mmBtu/hr each,
(d) one (1) cold cleaner degreasing operation with a capacity of 20 gallons to clean small parts;
(e) three (3) granulators that chop waste film and recirculate to the mixing line;
(f) one (1) plastisol mixing line with emissions exhausting to the interior of the plant;
(g) VOC/HAP storage containers for lubricating oils, hydraulic oils, machining oils, and machining fluids;
(h) equipment relating to manufacturing activities that does not result in HAP emissions including brazing equipment, cutting torches, soldering equipment, and welding equipment;
(i) closed loop heating and cooling systems;
(j) natural draft cooling towers not regulated under a NESHAP;
(k) replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
(l) paved and unpaved roads and parking lots with public access; and
(m) blowdown for sight glass, boiler, compressors, pumps, and cooling towers.
(n) Two natural gas fired dryers rated at 304,000 BTU/hr each,
(o) One natural gas fired space heater rated at 580,000 BTU/hr.

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter
That pursuant to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the 2.7 million BTU/hour boiler, the new 2.0 mmBtu/hr boiler, and the new two (2) indirect-fired heaters shall be limited to 0.6 pound per million BTU heat input.

D.2.2 Volatile Organic Compounds
That pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) and 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), the degreasing operation shall comply with the requirements of this rule.

(a) According to 326 IAC 8-3-2, the owner or operator shall:

(1) equip the cleaner with a cover;

(2) equip the cleaner with a facility for draining cleaned parts;

(3) close the degreaser cover whenever parts are not being handled in the cleaner;

(4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) provide a permanent, conspicuous label summarizing the operation requirements; and

(6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(b) According to 326 IAC 8-3-5(a), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one hand if:

A) the solvent volatility is greater than three-tenths (0.3) pounds per square inch (15 millimeters of mercury) measured at 38 degrees Celsius (100 degrees Fahrenheit);

B) the solvent is agitated; or

C) the solvent is heated.

(2) equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than six-tenths (0.6) pounds per square inch (thirty-two (32) millimeters of mercury) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) provide a permanent, conspicuous label which lists the operating requirements outlined in 326 IAC 8-3-5(b).

(4) the solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than six-tenths (0.6) pounds per square inch (thirty-two (32) millimeters of mercury) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

A) a freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

B) a water cover when solvent is used is insoluble in, and heavier than, water.

C) other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(c) That pursuant to 326 IAC 8-3-5(b), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) close the cover whenever articles are not being handled in the degreaser.

(2) drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

State Form 47738 (5-96)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Product Specialties, Inc.
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150
FESOP No.: F043-6294-00039

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)

9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)

9 Relocation Notification

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

State Form 47741 (5-96)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
DEVIATION OCCURRENCE REPORT

Source Name: Product Specialties, Inc.
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150
FESOP No.: F043-6294-00039

If a deviation has occurred, a separate copy of this report must be submitted for **each** monitoring device on all control equipment listed in this permit. Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
9 Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40% VOC in inks, 0.5% sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
9 Permit Has No Content Limitations for this Parameter.
Comments:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Product Specialties, Inc.
Source Address: 2073 McDonald Avenue, New Albany, Indiana 47150
Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150
FESOP No.: F043-6294-00039 Issued: August 12, 1997
Amendment: SMF/ENSR-043-10076-00039
Facility: Laminators EU-08 and Laminator EU-12
Pollutant: VOC
Production Limit: Laminator EU-08 - 7,384,680 yards per 12-month period, rolled on a monthly basis.
Laminator EU-12 - 7,384,680 yards per 12-month period, rolled on a monthly basis.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

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Mailing Address: 2073 McDonald Avenue, New Albany, Indiana 47150
FESOP No.: F043-6294-00039 Issued: August 12, 1997
Amendment: SMF/ENSR-043-10076-00039
Facility: Sourcewide Facilities (Laminators EU-08 & EU-12; Rotogravure Presses EU-09 & EU-11; Wash Coater #2; Extruders EU-06 & EU-07; & insignificant activities
Limit: Rotogravure Press EU-09 - 5.6 tons of VOC input usage per 12-month period
Rotogravure Press EU-11 - 14.8 tons of VOC input usage per 12-month period
Wash Coater #2 - 8.1 tons of VOC input usage per 12-month period
Extruder EU-06 and EU-07 - 9,127,920 lb of mat'l cmpd. per 12-month period
These limits together with the laminators and insignificant activities will result to a VOC emissions of 99 ton/12 month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

Note: This Form shall be filled out for each VOC emitting facility

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for First Significant Revision to Federally Enforceable State Operating Permit (FESOP)

Product Specialties, Inc.
2073 McDonald Avenue
New Albany, Indiana 47150

F-043-10564, Plt ID-043-00039

On April 6, 2000, the Office of Air Management (OAM) had a notice published in the New Albany Tribune, New Albany, Indiana, stating that Product Specialties, Inc. had applied for a significant revision to a Federally Enforceable State Operating Permit (FESOP) to operate plastic film manufacturing plant. The notice also stated that OAM proposed to revise the permit for this operation and provided information on how the public could review the proposed revision and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be revised as proposed.

On March 1, 2000, Product Specialties Inc. submitted comments on the proposed FESOP revision. These comments (underlined) and OAM's responses (with changes to permit conditions in **bold** and ~~strikeout~~ where required) are as follows:

Comment 1

Section A.2 Page 4 of 26
(D) 521 pounds per hour. Change to approximately 1,200 pounds per hour as stated on page 3 of 5 on the Technical Support Document

Response 1

This has been explained in the Technical Support Document page 3 of 5 that 521 pounds per hour is not a specific limit. Sections A and D of the permit are for descriptive information only and do not represent enforceable conditions. Additional text explaining this is added before section A and D of the permit. Hence no change will be made to this condition.

Comment 2

Section A.3 Page 5 of 26
(F) Plastisol mixing line is not vented to V3. This line exhausts to the interior of the plant

Response 2

Condition A.3 (f) on page 5 of 26 is modified as follows:

(f) one (1) plastisol mixing line with emissions exhausting to ~~stack vent V3~~ **the interior of the plant**;

Comment 3

Section D.1 Page 19 of 26
(D)As stated in A.2 the 521 pounds needs to be changed to approximately 1,200 pounds

Response 3

See response # 1

Comment 4

Section D.2 Page 23 of 26
(F) Plastisol mixing line exhausts into the plant and not to stack V3

Response 4

Condition D.2 (f) on page 23 of 26 is modified as follows:

(f) one (1) plastisol mixing line with emissions exhausting to ~~stack vent V3~~ **the interior of the plant**;

Comment 5

Section A.2 and D.1 page 5 of 5
(3) Change 521 pound of compound per hour to approximately 1,200 pounds per hour as on page 3 of 5 – Permit Change #1

Response 5

See response # 1

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Product Specialties, Inc.
Source Location:	2073 McDonald Avenue, New Albany, Indiana
County:	Floyd
SIC Code:	3081
Operation Permit No.:	F043-6294-00039
Operation Permit Issuance Date:	August 12, 1997
Significant Permit Revision No.:	0043-10564-00039
Permit Reviewer:	Gurinder Saini

The Office of Air Management (OAM) has reviewed a revision application from Product Specialities, Inc. relating to the descriptive changes for the extruders and some additional insignificant activities. These activities are two small (304,000 BTU each) indirect fired natural gas burning dryers on the existing printing line and one small (580,000 BTU) Thermal Cycle Unit used for space heat.

History

On January 21, 1999, Product Specialities, Inc. submitted an application to the OAM requesting changes to their FESOP.

Existing Approvals

The source was issued a FESOP F043-6294-00039 on August 12, 1997. The source has since received the following:

(a) First Significant FESOP Modification No.: 043-10076, issued on November 16, 1998

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

Emission Calculations

See page 1 and 2 in Appendix A of this document for detailed emissions calculations.

Potential To Emit of the Insignificant Activities

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	0
PM-10	0
SO_2	0
VOC	0
CO	0.4
NO_x	0.5

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Hexane	0.009
TOTAL	***0.009***

Justification for Revision

This FESOP is being revised through a Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(f). It is a significant revision because the limit for each extruder will be combined into a single limit.

County Attainment Status

The source is located in Floyd County.

Pollutant	Status **(attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)**
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	nonattainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (Nox) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Floyd County has been designated as nonattainment for ozone.

Potential to Emit after addition of the insignificant activities

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Storage/Handling	33.6	33.6	0	0	0	0	0
Extruders	14.6	14.6	0	19.6	0	0	0
Laminators	3.6	3.6	0	48	0	0	0
Printers	0	0	0	20.4	0	0	0
Wash Coaters	0	0	0	8.1	0	0	0
Plastic Film Line	15.4	15.4	0	0	0	0	0
Insignificant Activities	0.033	0.033	0.002	2.6	0.46	0.77	0.06
Total Emissions	67.2	67.2	0.004	99.0	0.46	0.77	0.06

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to these insignificant activities.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to these insignificant activities.

State Rule Applicability - Individual Facilities

There are no Rules applicable to these insignificant activities.

Permit Changes

The following changes were requested by the company. The changes will be noted in the bold and strikeout format.

1. In the draft document, the company failed to see that the annual reduction also resulted in the hourly operating rate of each extruder being lowered from its original 1750 lbs per hour to the new specification of 521 lbs per hour. To meet production demands, extruding systems typically operate at approximately 1,200 lbs per hour for 24 hours per day, several days per week. The current hourly limit will be removed from the permit or the original hourly limit will be added to the permit. The current annual limit is acceptable so no additional emissions are being requested and the FESOP is not impacted. If the short term limit is to be stated in the permit it should be 2.6 lbs Particulate Matter per hour for each source.

The idea that the 521 pounds per hour was a specific limit is incorrect. The language in Sections A and D of the permit are intended to be descriptive information only and to not represent enforceable conditions. The following language will be added to Sections A and D to make this clear.

Additionally, the short term limit for the permit will not be combined because the two extruders pemit from two separate stacks. A combined limit would cause difficulty in compliance testing.

At the beginning of Section A, the following will be added:

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

The description boxes in Section D will be amended as follows:

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

2. Product Specialities is requesting that IDEM add the two extrusion lines together for determining the annual limit on the production of extrusion materials. This would provide for additional flexibility in the manufacturing process. Extrusion would then be limited to 5.2 lbs PM per hour and production would be limited to 9,127,920 lbs per 12 month period, rolled on a monthly basis.

As noted in the previous response, the pounds per hour rates will not be combined. However, the production limitation will be combined. Condition D.1.7(a) and (b) will be combined:

D.1.7 Volatile Organic Compounds [326 IAC 2-8]

Pursuant to 326 IAC 2-8, the following facilities shall be limited as follows:

~~(a) The materials compounded from Extruder Line 1, EU-06 shall be limited to 4,563,960 pounds per 12-month period, rolled on a monthly basis.~~

~~(b) The materials compounded from Extruder Line 2, EU-07 shall be limited to 4,563,960 pounds per 12-month period, rolled on a monthly basis.~~

(a) **The material compounded from Extruder Line 1 EU-06 and Extruder Line 2 EU-07 shall be limited to 9,127,920 pounds per 12 month period, rolled on a monthly basis.**

~~(c)~~ **(b)** The VOC input usage from the new Rotogravure Press, shall be limited to 14.8 tons per 12month period rolled on a monthly basis. During the first twelve (12) months of operation of this press, its input VOC usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 1.9 tons per month.

~~(d)~~ **(c)** The VOC input usage from the new Wash Coater #2, shall be limited to 8.1 tons per 12month period rolled on a monthly basis. During the first twelve (12) months of operation of this coater, its input VOC usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 0.675 tons per month.

~~(e)~~ **(d)** The VOC input usage from the existing Rotogravure Press, EU-09 shall be limited to 5.6 tons per 12-month period rolled on a monthly basis.

Compliance with conditions D1.7(a) through ~~(e)~~ **(d)** and D1.6 (a) and (b) shall make 326 IAC 2-7, Part 70 Permit Requirements not applicable.

3. The extruders are co-located in the same building. A.2(d), D.1(d) need to be corrected to reflect this change.

Sections A.2(d) and D.1(d) are amended as follows:

Two (2) extrusion units, identified as EU-06 and EU-07, ~~located in two separate buildings~~ that exhaust to stacks S4 and S5, respectively. Each extrusion unit is limited to 521 pounds of compound per hour;

4. The two plastic film mixing lines are now to be vented to baghouse located inside the building and also exhausting to the inside of the building. This baghouse is identified as Baghouse #4. In addition, the dry scales on each line are separately vented to filter socks which discharge to the interior of the building. The scale transfer has been re-evaluated and it has been determined that no emissions result from this process. The liquid mixer and the liquid scales are not vented. These changes do not impact the emission from the sources.

Sections A.2(c) and D.1.(c) are amended as follows:

Two (2) plastic film mixing lines, identified as EU-05, and EU-10. Each line consists of a dry scale, scale transfer, mixer transfer, **mixer,** cool blend transfer, tote transfer, **ribbon blender,** and ribbon blend transfer. The dry scales, ~~scale transfer and mixer transfer operations shall be equipped with a baghouse that exhausts of stack vent V3~~ **shall be equipped with dedicated filter socks that exhaust to the interior of the plant. The mixer and mixer transfer operations shall be equipped with a baghouse which exhausts to the interior of the plant.** These lines also consists of a liquid scale with a maximum throughput of 4,800 pounds per hour and a liquid mixer with a maximum throughput of 720 pounds per hour ~~and exhausts to stack vent V3~~;

5. The calcium carbonate storage silo, source ID EU-04 is now vented to stack ID V3, not V4 as listed in the permit. Please correct specification located in A.2(b)

Sections A.2(b) and D.1.(b) are amended as follows:

One (1) calcium carbonate (CaCO3) storage silo, EU-02, with a maximum storage capacity of 61 tons. This silo is equipped with a baghouse for particulate matter control and exhausts to stack vent V2. The material is conveyed via one (1) CaCO3 transfer system, EU-04, with a maximum throughput capacity of 2,590 tons per year. This system exhausts to stack vent ~~V4~~ **V3**;

6. Product Specialties is requesting that these emission units be added to the list of Insignificant Activities in section A.3.

Sections A.3 and D.2 are amended as follows:

(n) **Two natural gas fired dryers rated at 304,000 BTU/hr each,**

(o) **One natural gas fired space heater rated at 580,000 BTU/hr.**

Conclusion

These changes shall be subject to the conditions of the attached proposed Significant Permit Revision 043-10564-00039.